KINGSTON GRAMMAR SCHOOL

FOUNDED 1561

SAFEGUARDING & CHILD PROTECTION POLICY AND PROCEDURES

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SEE SECTION 9 FOR WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD

KEY SCHOOL CONTACTS

Designated Safeguarding Lead (DSL) Mr Ollie Garner (Assistant Head, Safeguarding and Wellbeing))	Email: dsl@kgs.org.uk or ogarner@kgs.org.uk
	Telephone number (term time): 020 8481 3667
	Holiday/ out of hours: dsl@kgs.org.uk
Deputy Designated Safeguarding Leads (DDSLs)	Mr Andy Beard (Assistant Head, Head of Lower School) Email: ABeard@kgs.org.uk mailto:or dsl@kgs.org.uk Telephone (term time): 020 8939 8829
	Mr. Simon Grant (Head of Second Year) Email: MGrant@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8939 8320
	Mrs A Lett (Assistant Head, Head of Upper School) Email: Alett@kgs.org.uk Telephone (term time): 020 8939 8804
	Ms A Williams (Deputy Head Pastoral, Head of Sixth Form) Email: AWilliams@kgs.org.uk Telephone (term time): 020 8481 3672
	Mrs S Moledina (School Nurse) Email: SMoledina@kgs.org.uk Telephone (term time): 020 8939 8841
	Mrs Anna Edwards (Head of Psychology) Email: Aedwards@kgs.org.uk Telephone (term time): 020 8481 3653
Head Mr Stephen Lehec	Email: head@kgs.org.uk
	Telephone number: 020 8939 8801
Chair of Governors Mr Jatinder Harchowal	Email: jharchowal@kgs.org.uk
	Telephone number: 020 8546 5875

Designated Teacher for Looked After Children Mr Ollie Garner (Assistant Head, Safeguarding and Wellbeing)	Email: dsl@kgs.org.uk or ogarner@kgs.org.uk
	Telephone number (term time): 020 8481 3667
Special Educational Needs and Disability (SEND) Oversight Mrs A Lett (Assistant Head, Head of Upper School)	Email: Alett@kgs.org.uk
	Telephone number: 020 8939 8804
Nominated Safeguarding Governor	Nominated Safeguarding Governor: Ms Liz Dux Email: ldux@kgs.org.uk Telephone number: 020 8546 5875
	Deputy Safeguarding Governor: Ms Sally Bryce Email: sbryce@kgs.org.uk Telephone number: 020 8546 5875

KEY EXTERNAL CONTACTS

Designated Officer(s) of the local authority (LADO)	Telephone number: 07774 332675 Email: LADO@achievingforchildren.org.uk Online: Submit LADO referral form
Kingston children's social care department[1]	Telephone number: 0208 547 5008 Contact us (achievingforchildren.org.uk) Out of hours emergency: 0208 770 5000 Duty team telephone number: 0208 770 5000
Kingston and Richmond Safeguarding Children Partnership (KRSCP)	Contact KRSCP - Kingston and Richmond Safeguarding Children Partnership Address: c/o London Borough of Richmond upon Thames, 44 York Street, (Ground Floor), Twickenham, TW1 3BZ Telephone number: 07834 386459 Email: lscb-support@kingrichlscb.org.uk
FGM reporting - non-emergency police contact number	101
Police liaison officer	Supervisor for Kingston Safer Schools - PS Simon Bennett Email simon.bennett@met.police.uk Mobile: 07747 296 083
Prevent partners and contacts for advice about extremism	Contact the anti-terrorism hotline on 0800 789 321 to report any concerns. The hotline is staffed 24/7. Even if you are not sure of what is happening, you can tell your concerns to the specially trained officers who can look into it. Call 999 if you suspect immediate danger.

[1] If you think a child or young person is at risk or being abused or neglected, contact the children's social care team at the child's home local council. If you do not know where they live, contact the school's local council's team, the NSPCC or the Police for advice.

	Call 101 to speak to your local police in a non-emergency. To get help or report concerns related to the Prevent anti-terrorism programme in Kingston and Richmond: contact your local council's Prevent team through their websites, or call the national police Prevent advice line on 0800 011 3764. The Kingston and Richmond Safeguarding Children Partnership can be contacted for concerns about young people, or visit the GOV.UK website for more details on radicalisation and how to report online content. Referrals: SPA 020 8547 5008 or Make a referral to the Single Point of Access - The Single Point of Access - Richmond.gov.uk (achieveservice.com) Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	Homepage - UK Safer Internet Centre Email: enquiries@saferinternet.org.uk Call: 0344 800 2382
NSPCC whistleblowing helpline	Whistleblowing Advice Line | NSPCC NSPCC Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk
Reporting serious wrongdoing to the Charity Commission	For further guidance see: Report serious wrongdoing at a charity as a worker or volunteer - GOV.UK (www.gov.uk) Email: whistleblowing@charitycommission.gsi.gov.uk

Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk

1 Aims

1.1 This is the Safeguarding & Child Protection Policy and Procedures of Kingston Grammar School (**School**).

1.2 The aims of this Policy are as follows:

1.2.1 to actively promote the well-being of students[2];

1.2.2 to safeguard and promote the welfare of children[3], staff and others who come into contact with the School and to protect them from harm;

1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse, neglect and / or exploitation;

1.2.4 to raise staff awareness about the School's safeguarding expectations;

1.2.5 to raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature;

1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.2.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero-tolerance approach to sexism, racism, misogyny/misandry, homophobia, biphobia, child-on-child abuse including sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict in which students are confident to report it and staff are confident to identify and respond to it; and

1.2.8 to promote a whole school culture of safety, equality and protection.

1.3 Every student should feel safe and protected from any form of abuse, neglect and exploitation.

1.4 All staff should understand the indicators of abuse, neglect, exploitation and modern slavery and understand specific safeguarding risks so that they can identify them and report any concerns about children, including where they are given reason to suspect that a child sex offence may have been committed. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.5 Members of the School community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

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[2] This wording reflects the requirements in part 8 paragraph 34 of the ISSR. Well-being means well-being within the meaning of section 10(2) of the Children Act 2004(a): the physical and mental health and emotional well-being; protection from harm and neglect; education training and recreation; contribution made by pupils to society; social and economic well-being.

[3] This wording reflects the requirements in part 3 paragraph 7 of ISSR.

1.6 All staff should be aware that the Crime and Policing Act 2026 imposes a duty in certain circumstances to notify the police and/or local authority where, in the course of a relevant activity, a person is given reason to suspect that a child sex offence may have been committed.

1.7 The School recognises that safeguarding risks are dynamic and may evolve over time. This includes risks arising from online activity, emerging technologies (including artificial intelligence), misogyny and harmful gender-based attitudes, and the fact that safeguarding issues are often interrelated and may overlap. The School will take a proactive and responsive approach to identifying and addressing such risks.

1.8 Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively and that appropriate action will be taken.

1.9 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of students underpins and is at the heart of all decisions, systems, processes and policies.

1.10 Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, students, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

2 Scope and application

2.1 This Policy applies to the whole School.

2.2 This Policy applies to all registered students, whether they are under or over 18 years of age.

2.3 This Policy applies at all times including where students or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.

2.4 This Policy applies to core School activities and to out of hours and any commercial activities[4].

2.5 This Policy is designed to address:

2.5.1 the specific statutory obligations on the School to safeguard and promote the welfare of children; and

[4] Paragraphs 200-201 of KCSIE 2026 require the School to make sure there are adequate safeguarding arrangements in place for commercial activities, even if they do not involve students.

2.5.2 the School's charity law safeguarding duty. Safeguarding responsibilities are a key governance priority for the trustees and for everyone. The trustees are committed to the School being a safe and trusted environment. Everyone must take reasonable steps to protect the people who come into contact with the charity through its work, from harm. This includes students, anyone else who benefits from the School's work, staff, volunteers, parents or anyone else who comes into contact with the School through its work. Even where the School may not strictly have a duty of care, steps to address the risk of harm will be considered.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under the following legislation:

3.1.1 Education (Independent School Standards) Regulations 2014

3.1.2 Education and Skills Act 2008

3.1.3 Children Act 1989

3.1.4 Children Act 2004

3.1.5 Childcare Act 2006

3.1.6 Education and Training (Welfare of Children) Act 2021

3.1.7 Safeguarding Vulnerable Groups Act 2006

3.1.8 Children and Social Work Act 2017

3.1.9 Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 (together referred to as **data protection laws**;)

3.1.10 Equality Act 2010

3.1.11 Human Rights Act 1998

3.1.12 Charities Act 2011

3.1.13 Care Act 2014

3.1.14 Crime and Policing Act 2026.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Statutory guidance:

(a) Keeping children safe in education (DfE, September 2026) (**KCSIE**)

(b) Working together to safeguard children 2026 (DfE, updated March 2026) (**WTSC**)

(c) Working together to improve school attendance (DfE, July 2026)

(d) Mobile phones in schools: guidance (DfE, January 2026, became statutory on 29 June 2026)

(e) Disqualification under the Childcare Act 2006 (DfE, August 2018)

(f) Prevent Duty guidance for England and Wales (HM Government, December 2023)

(g) Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020)

(h) Children missing education (DfE, updated September 2025)

(i) Relationships education, relationships and sex education and health education guidance (DfE, September 2026)

(j) Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023, updated December 2023)

(k) PACE Code C 2019.

3.2.2 Non statutory guidance:

(a) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)

(b) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024)

(c) Sharing information to safeguard children and young people in the education sector in the UK (ICO)

(d) The key principles of Prevent (Home Office, February 2026)

(e) Behaviour in schools: advice for headteachers and school staff (DfE, February 2024)

(f) Meeting digital and technology standards in education (DfE, maintained)

(g) Plan technology for your school (HM Government, September 2024)

(h) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DSIT and UKCIS, March 2024)

(i) Searching, screening and confiscation: advice for schools (DfE, in force from September 2022)

(j) Teaching online safety in schools (DfE, January 2023)

(k) Generative AI: product safety expectations (DfE, January 2025)

(l) Using AI in education settings: support materials (DfE, June 2025)

(m) Harmful online challenges and online hoaxes (DfE, February 2021)

(n) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme)

(o) Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)

(p) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, updated April 2024)

(q) Forced marriage resource pack (Home Office, May 2023)

(r) Educate Against Hate (HM Government, maintained)

(s) Managing the risk of radicalisation in your education setting (DfE, September 2023)

(t) Equality Act 2010: advice for schools (DfE, June 2018)

(u) After-school clubs, community activities and tuition: safeguarding guidance for providers (DfE, February 2026)

(v) Sponsorship Duties (UKVI, May 2025)

(w) Resources for education settings | CSA Centre

(x) Preventing Child Sexual Exploitation | The Children's Society

(y) CEOP Education

(z) Independent School Standards (DfE, April 2026)

3.2.3 Charities advice:

(a) Safeguarding and protecting people for charities and trustees (Charity Commission, June 2022)

(b) Safeguarding for charities and trustees (Charity Commission, November 2021)

(c) Charities and social media (Charity Commission, April 2026)

(d) How to report a serious incident in your charity (Charity Commission, January 2026)

(e) Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, June 2019)

(f) Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019)

(g) Guidance on reporting safeguarding concerns in a charity (Department for Digital, Culture, Media and Sport, March 2022)

(h) Guidance on handling safeguarding allegations in a charity | Department for Culture, Media and Sport

(i) Safeguarding for trustees by NCVO

(j) Charity Governance Code

(k) Good Governance for Safeguarding by Bond.

3.2.4 KRSCP referral / threshold procedures / guidance.

3.3 The following School policies, procedures and resource materials are relevant to this Policy:

3.3.1 Code of Conduct for Staff

3.3.2 Staff IT /Cyber Security Acceptable Use Policy

3.3.3 Whistleblowing Policy

3.3.4 Recruitment, Selection and Disclosure Policy and Procedures

3.3.5 Taking, Storing and Using Images of Children Policy

3.3.6 Student Mobile Phone and IT/Cyber Security Acceptable Use Policy

3.3.7 Attendance Policy

3.3.8 Student Device Policy

3.3.9 Online Safety Policy

3.3.10 Student AI Policy

3.3.11 Behaviour Policy

3.3.12 Anti-Bullying Policy

3.3.13 Smoking, Alcohol, Drugs and Other Substance Abuse Policy

3.3.14 Site Safety & Security Policy

3.3.15 Emergency Evacuation Policy & Procedures

3.3.16 Bomb Threat Response Policy & Procedures

3.3.17 Policy and Guidelines for Visiting Speakers

3.3.18 Risk Assessment Policy for Student Welfare

3.3.19 Missing Child Policy

3.3.20 SEND Policy

3.3.21 Health and Safety Policy

3.3.22 Fire Safety Policy

3.3.23 Relationships and Sex Education Policy

3.3.24 Personal, Social, Health and Economic Education Policy

3.3.25 First Aid Policy

3.3.26 Equality, Diversity and Inclusion Policy

3.3.27 Disability Policy and Accessibility Plan

3.3.28 Gender Questioning Children Guidance.

4 Publication and availability

4.1 This Policy is published on the School website.

4.2 This Policy is available in hard copy on request.

4.3 A copy of the Policy is available for inspection from the School Reception during the School day.

4.4 This Policy can be made available in large print or other accessible format if required.

4.5 This Policy and all policies referred to in it are also available to staff on the School's intranet.

5 Definitions

5.1 Where the following words or phrases are used in this Policy:

5.1.1 References to the **Proprietor** are references to the Governing Body.

5.1.2 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time,

references to **working days** are to the days on which the relevant external agency is working.

5.1.3 **Safeguarding** is the protection of people from harm.

5.1.4 **Safeguarding and promoting the welfare of children** is defined in KCSIE 2026 as:

(a) Providing help and support to meet the needs of children as soon as problems emerge;

(b) protecting children from maltreatment, whether that is within or outside the home, including online;

(c) preventing impairment of children's mental and physical health or development;

(d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

(e) taking action to enable all children to have the best outcomes.

5.1.5 **Child** means a child under the age of 18.

5.1.6 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.

5.1.7 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSLs (**DDSL**) where the DSL is unavailable.

5.1.8 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.

5.1.9 **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Board and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

5.1.10 **Early help** means support for children and families as soon as a problem emerges, at any point in a child's life. This includes universal and community-based early help services and targeted early help provided through Family Help arrangements. Family Help may include both non-statutory early intervention and support provided under section 17 of the Children Act 1989 (children in need).

5.1.11 The term **making or sharing nudes and semi-nudes** refers to the creation, sending or posting of nude or semi-nude images by young people under the

age of 18. The term "images" includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as "deepfakes" or "deep nudes".

5.1.12 References to **children missing education (CME)** mean children of compulsory school age who are not registered students at a school and are not receiving suitable education otherwise than at school.

5.1.13 References to **harmful sexual behaviour** in this Policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

5.1.14 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, trainee teachers, volunteers and Governors unless otherwise indicated.

5.1.15 Reference to the **Executive** means the Senior Leadership Team which comprises the Head, Director of Finance and Operations, Deputy Heads, Assistant Heads and Director of HR.

6 Responsibility statement and allocation of tasks: The School's approach to safeguarding leadership

6.1 The Proprietor has overall responsibility for all matters which are the subject of this Policy, including:

6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of students at the School, having regard to relevant guidance issued by the Secretary of State;

6.1.2 strategic leadership responsibility for the School's safeguarding arrangements. Contact details of the Governors Responsible for Safeguarding are set out in the School contacts list at the front of this Policy; and

6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

6.2 The Proprietor:

6.2.1 appoints two Board level leads on safeguarding matters (a Nominated Safeguarding Governor and a Deputy Safeguarding Governor), whose contact details are set out in the School contacts list at the front of this policy;

6.2.2 ensures that all members of the governing body receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

6.2.3 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;

6.2.4 ensures the School has appropriate cyber security systems in place, in line with the Cyber security standards, to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks;

6.2.5 ensures that appropriate arrangements are in place for the whole Board to discharge their function, including: appropriate consideration of safeguarding matters by the Safeguarding Group and (where applicable) by the Education Committee under Board delegation. The Nominated Safeguarding Governor (or their Deputy) attends termly meetings of the internal management Safeguarding Group which reports directly to the Governing Body. The purpose of the Safeguarding Group is to provide focused operational oversight of safeguarding practice, casework and compliance within the School, and to support effective assurance and reporting to the Governing Body, including where attendance and/or wellbeing issues give rise to safeguarding concerns. The Governing Body Education Committee which meets at least three times each year and reports to the Governing Body also considers safeguarding matters within its remit. Safeguarding is a standing item on the agenda for all Governing Body meetings, and the Board also receives termly safeguarding reports and undertakes a holistic annual review of safeguarding; and

6.2.6 establishes appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively. This includes the Safeguarding Group which meets every two weeks to monitor and assess students of key concern to ensure appropriate provision of safeguarding support by the School.

6.3 To ensure the efficient discharge of its responsibilities under this Policy, the Proprietor has allocated the following tasks:

Task	**Allocated to**	**When / frequency of review**
Keeping the Policy up to date and compliant with the law and best practice	Ollie Garner, DSL	As required, and at least termly
Monitoring the implementation of the Policy, relevant risk assessments and any action	Ollie Garner, DSL	As required, and at least termly

Task	Allocated to	When / frequency of review
taken in response and evaluating effectiveness		
Seeking input from interested groups (such as students, staff, parents) to consider improvements to the School's processes under the Policy	Ollie Garner, DSL	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedures and their implementation	Proprietor	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Proprietor Ollie Garner, DSL / David Leen, Director of Finance & Operations	Before commencement of arrangement and thereafter at least annually

6.4 **Head**

6.4.1 The Head is responsible for the overall management of the School and for the management of concerns and allegations about staff.

6.4.2 The Head ensures that the School's policies and procedures adopted by the Proprietor (particularly those concerning referrals of cases of suspected abuse and neglect) are understood and followed by all staff.

6.5 **Designated Safeguarding Lead (DSL)**

6.5.1 The DSL is a senior member of staff of the School's leadership team with the necessary status, authority, skills and experience to take lead responsibility for all aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the School. There is a team of Deputy DSLs who will support the DSL in their duties and deputise in their absence.

6.5.2 The DSL has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Annex B of KCSIE.

6.5.3 The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE Code C and any other code of practice apply.

6.5.4 The DSL will take lead responsibility for students who are looked after children.

6.5.5 The DSL (or deputy DSL) will, where required, make notifications to the local authority and/or police in accordance with the School's safeguarding obligations, including the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026[5].

6.5.6 The DSL, as Senior Mental Health Lead at the School, is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of students and staff.

6.5.7 The DSL will undertake the role of senior attendance champion with overall responsibility for student attendance and for liaising with students, parents and external agencies in that regard.

6.5.8 The School maintains formal cover arrangements to ensure continuity of safeguarding when the DSL is unavailable. If the DSL is unavailable, the activities of the DSL will be carried out by the Deputy DSLs. The Deputy DSLs' details are also set out in the School contacts list at the front of this Policy.

7 Specific safeguarding duties in relation to children

7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

7.2.1 The School will:

(a) understand its role in the three safeguarding partner arrangements and operate safeguarding procedures in line with the locally agreed multi-agency procedures of the KRSCP;

(b) be alert to signs of abuse, whether in school, within the child's family or from outside and take immediate steps to protect

[5] The Crime and Policing Act 2026 introduces a new statutory duty for individuals undertaking key roles with responsibility for children and young people in England to report suspected child sex offences when they are made aware of it.

individuals from any form of abuse, neglect, exploitation or modern slavery, whether from an adult or another child;

(c) ensure that concerns, allegations and disclosures relating to child sexual abuse are managed in accordance with statutory safeguarding requirements and that, where a person is given reason to suspect that a child sex offence may have been committed, any notification required under the Crime and Policing Act 2026 is made as soon as practicable;

(d) be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds;

(e) understand the impact of poverty and the distinction between poverty and neglect;

(f) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from, abuse;

(g) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

(h) take active steps to promote, monitor and analyse school attendance;

(i) allow staff to determine how best to build trusted relationships with students which facilitate communication within the parameters of the staff code of conduct;

(j) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and/or welfare plans;

(k) design and operate procedures which, so far as possible, ensure that staff, students and others are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(l) prepare staff to identify children who may experience vulnerability and may benefit from universal services and community-based Early Help, and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;

(m) take a whole-school public health / preventative approach to harmful sexual behaviour, recognising the escalatory nature of misogyny and other forms of prejudice from low-level sexist language to more serious harmful behaviours, which may contribute to an unsafe environment or normalisation of abuse, and the benefits of early identification and intervention;

(n) be alert to risks online and take reasonable steps to protect children from online harm, including in its approach to filtering and monitoring;

(o) put in place appropriate security protection measures to safeguard information systems and review the effectiveness of these procedures;

(p) take appropriate action to meet the Cyber security standards in order to improve resilience against cyber attacks;

(q) be alert to children who are at potentially greater risk of harm (both online and offline) including children who need a social worker and children requiring mental health support;

(r) be alert to the needs of students with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect;

(s) encourage a culture of listening to students and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them. There are two counsellors and counselling is available five days a week to work with students on a wide range of issues and concerns. The School can also assist students, and where appropriate their families, to access local support services if needed;

(t) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(u) assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(v) identify students who may be susceptible to extremist ideology and radicalisation, and know what to do when they are identified;

(w) comply with its statutory duties and have regard to relevant guidance on safeguarding requirements for School premises[6], including ensuring that toilets, changing facilities and showers are provided and used in accordance with legal requirements relating to single-sex provision, and that any alternative arrangements are considered carefully, recorded and reviewed, without compromising safety, privacy, dignity or wellbeing of students;

[6] KCSIE 2026 paras 104 - 115

(x) ensure that participation in sport and physical education is organised in a way that is safe, fair and appropriate, including where necessary providing for single-sex participation in accordance with the Equality Act 2010 and safeguarding considerations[7], and that any requests are considered on a case by case basis with regard to the child's welfare, safety and fairness of the activity and the impact on other students. The School's approach, including its safeguarding duties and the process for considering any requests relating to social transition, is set out in the School's Gender Questioning Children Guidance;

(y) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students in the School or in the local area;

(z) ensure that appropriate policies and procedures are in place to safeguard students which it sponsors to study in the UK under the Student or Child Student immigration route.

7.3 Staff may follow the School's Whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this Policy for the relevant contact details). Staff may also report concerns direct to the School's Local Authority or to the Charity Commission if they consider that the School has failed to deal with concerns appropriately.

8 Students aged 18 or over

8.1 It is not uncommon for the School to have some students on roll who reach the age of 18 or 19 in the course of their education. The School's safeguarding responsibilities extend to all members of the School community and its safeguarding policies, procedures, and codes of conduct apply to all students, including those aged 18 or over. The School acknowledges its duty of care to these students and the need to consider their specific needs and rights, as well as the need to manage any risk they may present to others, with reference to differences in legal status, maturity, or life experience, for example. Where a student who is aged 18 or over presents safeguarding concerns, the School will consider whether they are, or may be, an "adult at risk" under the provisions of the Care Act 2014. If so, it will follow appropriate safeguarding procedures, including referrals to the relevant local authority's safeguarding adults board, where relevant.

[7] KCSIE 2026 paras 94 - 97

9 Reporting obligations of staff

9.1 Reporting obligations generally

9.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the **best** interests of the student.

9.1.2 Staff should be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of protection.

9.1.3 All staff have a duty to:

(a) report any concerns they may have about the safety and/or well-being of students;

(b) where, in the course of engaging in a relevant activity, they are given reason to suspect that a child sex offence may have been committed, comply with any statutory duty to report that suspected offence and cooperate with the School and the DSL in relation to any notification required under the Crime and Policing Act 2026, including where such notification is made by the DSL on their behalf;

(c) report any concerns they may have about the safety and/or well-being of other persons associated with the School;

(d) report any safeguarding concerns about staff or anyone else associated with the School; and

(e) follow up on any such reports to ensure that appropriate action is or has been taken.

9.1.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the Executive team or directly to children's social care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

9.2 What to do if staff have a concern about a student's welfare

(a) If staff have **any concern about a student's welfare**, they should follow the procedures in this Policy and report their concern to the DSL (or the DDSLs in the DSL's absence) **immediately**. The contact

details of the DSL and DDSLs are set out in the contacts list at the front of this Policy;

(b) See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 23 below relating to recording a concern.

9.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

9.2.3 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, trainee teacher, contractors or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

9.2.4 Teachers must report known cases of female genital mutilation (FGM) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

9.2.5 Where, in the course of engaging in a relevant activity, a member of staff is given reason to suspect that a child sex offence may have been committed, they must report the matter to the DSL (or DDSL in the DSL's absence) as soon as practicable. Where a notification is required under the Crime and Policing Act 2026, this will ordinarily be made by the DSL on behalf of the member of staff in accordance with the School's safeguarding procedures.

9.2.6 **What if the DSL is unavailable**?

(a) The DSL or the DDSLs should always be available to discuss safeguarding concerns and may be contacted in relation to any safeguarding concerns outside of school hours. Contact details are set out at the front of this Policy.

(b) If in exceptional circumstances the DSL and DDSLs are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the Executive team and/or advice should be taken from children's social care. Their contact details are set out at the front of this Policy.

(c) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and/or the police in these circumstances. See section 12 below for further details on making a referral.

(d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSLs, or a member of the Executive team, as soon as is practically possible.

9.3 **Action by the DSL**

9.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate local safeguarding partners' procedures and referral threshold document:

Single Point of Access (Richmond) :: Kingston and Richmond NHS Foundation Trust

Threshold - Kingston and Richmond Safeguarding Children Partnership

Such action may include:

(a) managing any support for the student internally via the School's own pastoral support processes, including considering, where doing so does not place the child at additional risk, whether parents or carers should be informed to further support the child's wellbeing, and seeking advice from children's social care where required (see 10 below);

(b) undertaking a universal services and community based Early Help assessment (which generally requires parental consent - see 11 below); or

(c) making a referral for statutory services (see 12 below).

9.3.2 Where a notification is required under the Crime and Policing Act 2026, the DSL will make or arrange for the notification to be made to the relevant local authority and/or police force as soon as practicable and in accordance with applicable legislation and guidance.

9.3.3 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

9.3.4 Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

9.3.5 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the student's situation does not appear to be improving.

10 Managing support for students internally

10.1 The School takes a proactive stance in supporting the mental health and wellbeing of its students as well as in the early identifying of any concerns. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School employs a range of whole-school strategies to support students' mental health. These include, but are not limited to the following:

- The School's PSHE provision

- Regular pastoral collapse days
- Data-led benchmarking of vulnerable students
- Encouraging our students to discuss any concerns with key pastoral leads including our Nurses and Counsellors
- Regular mental health training for all our staff
- Staff can also access a range of advice to help them identify children in need of extra mental health support, this includes working with agencies.

10.2 The School has a framework for the identification, assessment, management and review of risk to student welfare so that appropriate action can be taken to reduce the risks identified and address the child's wellbeing needs. See section 23 and the School's Risk Assessment Policy for Student Welfare.

10.3 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

11 Universal services and community based Early Help assessment

11.1 Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area.

11.2 Universal services and community based Early Help are distinct from targeted early help delivered through Family Help teams, which are more formal arrangements coordinated by local authorities, where a plan is in place and a lead practitioner appointed.

11.3 The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from universal services and community-based Early Help, or targeted Early Help through Family Help arrangements. Staff are mindful of specific safeguarding issues and those students who may face additional safeguarding challenges and/or varying resilience levels from time to time. Staff should be particularly alert to the potential need for early help for a child who:

11.3.1 is disabled or has certain health conditions and has specific additional needs;

11.3.2 has special educational needs (whether or not they have a statutory education, health and care plan (**EHCP**));

11.3.3 has a mental health need;

11.3.4 is a young carer;

11.3.5 is pregnant and/or is a parent themselves;

11.3.6 has exhibited early signs of abusive, violent and/or harmful behaviours;

11.3.7 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

11.3.8 is frequently missing / goes missing from education, home or care;

11.3.9 has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school or has spent time in Alternative Provision or in a Pupil Referral Unit;

11.3.10 is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation;

11.3.11 is at risk of being radicalised or exploited;

11.3.12 has a parent or carer in custody, or is affected by parental offending;

11.3.13 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

11.3.14 is misusing alcohol or other drugs themselves;

11.3.15 is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;

11.3.16 is a privately fostered child;

11.3.17 is a looked after child; or

11.3.18 is a student from overseas without any adult family members in the UK.

11.4 A member of staff who considers that a student may benefit from community-based Early Help, or targeted Early Help through Family Help arrangements, should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the KRSCP menu of early help services and referral threshold document and will support staff in liaising with parents/carers and other agencies and setting up an inter-agency assessment as appropriate.

11.5 If early help is appropriate, staff may be required to support other agencies and professionals in a community based Early Help assessment and will be supported by the DSL in carrying out this role. In some cases, School staff may be required to take a lead role.

11.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the student's situation appears to be getting worse or does not appear to be improving.

12 Making a referral

12.1 **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care in line with local authority reporting procedures (and if appropriate the police) should be made immediately. Where required, a notification must also be made in accordance with the statutory duty to report suspected child sex offences under the Crime and Policing Act 2026.**

12.2 The contact details for the School's CSC team are set out at the front of this Policy. Staff should bear in mind that referrals may be required to the School's CSC team and / or the student's CSC team.

12.3 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC. Information about making a referral can be found here:

Single Point of Access (Richmond) :: Kingston and Richmond NHS Foundation Trust

12.4 **Statutory assessments**

12.4.1 Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

(a) **Children in need**: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

(b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

12.4.2 The threshold document published by Local Safeguarding Partners includes the criteria, including the level of need, for when a case should be referred for assessment and for statutory services under section 17 and 47.

12.5 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 22 of KCSIE and the flowcharts set out in Chapter 3 of WTSC for information about the likely actions and decisions required.

12.6 Parental consent is usually expected for referrals to statutory agencies, unless this may expose the child to additional harm or is not considered to be in the child's best interests, as staff will need to have access to certain information about the

child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

12.6.1 personal details of the child including the child's developmental needs;

12.6.2 detailed information about the concern;

12.6.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

12.7 If the referral is made by telephone, this should be followed up in writing.

12.8 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

12.9 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

12.10 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves. This will include taking action using the KRSCP Protocol. Clear process and procedures are laid out at: Resolving professional differences - Kingston and Richmond Safeguarding Children Partnership

13 Allegations against students: child-on-child abuse (including sexual harassment and sexual violence)

13.1 Allegations against students should be managed and reported in accordance with the procedures set out in this Policy (see Appendix 3). If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

13.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

14 Extra-familial harm

14.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.

14.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

14.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

14.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse, neglect, exploitation and/or modern slavery in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse including harassment and exploitation, domestic abuse in their own intimate relationships (teenage relationships abuse, including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious violence, county lines and radicalisation and harm associated with organised networks or gangs. The School will take a contextual safeguarding approach when assessing such risks.

15 Risk assessment

15.1 Where a concern about a student's welfare is identified, the risks to and needs of that student will be assessed and appropriate action will be taken to reduce the risks identified and address the child's wellbeing needs.

15.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual student welfare or safety plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting student welfare will be systematic and student focused.

15.3 The Head has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

16 What to do if staff have a safeguarding concern about someone else's welfare

16.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this Policy, should report them.

16.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

16.3 If, in exceptional circumstances, the DSL or a deputy is unavailable, this should not delay appropriate action. Staff should consider speaking to a member of the Executive team and/or contacting local authority children's social care directly. Any action taken must be shared with the DSL as soon as possible.

17 Allegations made and/or concerns raised about staff and others in School

17.1 The School has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any Other Adult (as defined in paragraph 2.3 of Appendix 4) which may affect the safety and welfare of children.

17.2 The procedures in this Policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. The policy and procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

17.3 The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

17.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with students, parents/carers, colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Handbook and the Code of Conduct for Staff and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with students.

18 Informing parents/carers

18.1 Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the LADO(s), children's social care, the police and/or the student (if they are considered to be of sufficient maturity and understanding) before discussing details with parents/carers.

18.2 In all cases, the DSL will be guided by the KRSCP referral threshold document and KCSIE.

18.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

19 Additional reporting

19.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

19.1.1 **Health and Safety Executive**

(a) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy for further details about this.

19.1.2 **Charity Commission**

(a) The School is a registered charity and will report all serious incidents to the Charity Commission promptly in accordance with the guidance How to report a serious incident in your charity (Charity Commission, January 2026).

19.1.3 **Disclosure and Barring Service (DBS)**

(a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4, 8.1 for further details.

19.1.4 **Teaching Regulation Agency (TRA)**

(a) The School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher for that reason had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. See Appendix 4, for more details.

19.1.5 **Insurers**

(a) The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b) Care should be taken to ensure this is done before renewal to ensure that the school complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

19.1.6 **UK Visas and Immigration**

(a) In the event that a student holding a Student or Child Student visa sponsored by the School under the Points Based System goes missing,

the School will report to UKVI in line with prevailing Student Sponsor Guidance.

(b) Each time the School's attendance register is completed it is treated as a contact point for these purposes.

(c) The School will also ensure that any changes to the care or living arrangements which are in place for a student holding a Child Student visa sponsored by the School meet the requirements of the Immigration Rules and UKVI's Student Sponsor Guidance. Where a change to a student's living or care arrangements do not comply with those requirements then this must be reported to UKVI including the details of the steps that are being taken to rectify the situation.

(d) Where a student holding a Child Student visa sponsored by the School will be cared for in a private foster care setting, the School will notify the local authority in the area where the student will be living as soon as the School becomes aware that the child has arrived in the UK or, if the private foster care arrangement begins after the student arrived in the UK, as soon as it becomes aware of the change.

(e) Reports to UKVI will be made by the School's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.

20 Safer recruitment and supervision of staff

20.1 The School is committed to practising safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) in accordance with Part 3 of KCSIE, including the requirements relating to regulated activity and DBS checks for volunteers introduced by the Crime and Policing Act 2026. See the School's separate Recruitment, Selection and Disclosure Policy and Procedures.

20.2 The School maintains a single central register of appointments for all staff.

20.3 The School's protocols for ensuring that visiting speakers are suitable and appropriately supervised are set out in the School's separate Policy and Guidelines for Visiting Speakers and Site Safety & Security Policy.

21 Use of mobile electronic devices and smart technology

21.1 In accordance with DfE guidance, the School maintains a mobile electronic device-free environment by default. For details information on the use of mobile electronic devices and smart technology, please refer to:

21.1.1 The School's Student Mobile Phone and IT/Cyber Security Acceptable Use Policy and Student Device Policy for students which sets out the expectations on students from Year 7 to Year 13;

21.1.2 All staff should use mobile devices and cameras and other electronic devices with imaging and sharing capabilities in accordance with the guidance set out in the Code of Conduct for Staff, Staff IT/Cyber Security Acceptable Use Policy and Taking, Storing and Using Images of Children Policy;

21.1.3 In accordance with the School's Taking, Storing and Using Images of Children Policy, parents of students may bring mobile devices onto the premises but may only take photographs of their own (and not other) children at school events or on school premises, and in any event only for personal use. Parents are reminded that the publication of images may be unlawful.

21.2 The School allows access to the internet on site. Appropriate internet safety measures are taken to manage associated risks including use of filters and monitoring of usage, generative AI and cyber attacks. The School recognises the evolving risks associated with emerging technologies, including the potential for AI to generate or manipulate images or content, such as deepfakes, to harm or exploit children. Staff will remain vigilant and respond in accordance with this Policy.

21.3 The School's approach to online safety is set out in the School's Online Safety Policy.

22 Training

22.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this Policy and have the necessary knowledge and skills to carry out their roles.

22.2 The level and frequency of training depends on the role of the individual member of staff.

22.3 The School maintains written records of all staff training.

22.4 All training will be carried out in accordance with KRSCP procedures where possible.

22.5 **Induction**

22.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(a) this Policy;

(b) the role, identity and contact details of the DSL and their Deputies;

(c) the Behaviour Policy for students;

(d) the Anti-Bullying Policy, which includes details on the School's policy on cyberbullying and prejudice-based and discriminatory bullying;

(e) the Code of Conduct for Staff including the Whistleblowing Policy, and Staff IT/Cyber Security Acceptable Use Policy (including use of social media);

(f) the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods;

(g) the School's approach to online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

(h) safeguarding training in accordance with KRSCP procedures including guidance on managing a report of child-on-child abuse (including sexual harassment and sexual violence);

(i) a copy of Part 1 and, where appropriate, Annex A of KCSIE for school leaders and those who work directly with children; and

(j) appropriate Prevent duty training.

22.6 **Safeguarding training**

22.6.1 All staff and School leaders will receive a copy of this Policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.

22.6.2 School leaders and all staff working directly with children will receive a copy of this Policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.

22.6.3 Members of the Executive (including the Head) and the Nominated Safeguarding Governors will receive a copy of this Policy and be expected to read all of KCSIE.

22.6.4 The Head and all staff members will undertake appropriate safeguarding training following consultation with the KRSCP which will be updated at least annually and in accordance with the KRSCP advice. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email, at Insets, e-bulletins and staff meetings on a regular basis and at least annually.

22.6.5 Staff development training will also include training on online safety, which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the school, measures in place to combat cybercrime, the School's approach to the use of generative AI by students and for educational purposes, searching students for prohibited

and banned items, and Prevent duty training assessed as appropriate for them by the School.

22.6.6 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse (including sexual harassment and sexual violence), harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudice-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

22.6.7 All Governors receive safeguarding training (including online safety) on induction and regularly updated thereafter. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding.

22.6.8 The Nominated Safeguarding Governors and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governors will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

22.6.9 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time and should, where appropriate, refer to the School's risk assessment for out of hours/out of term safeguarding arrangements.

22.6.10 **Designated Safeguarding Lead (DSL)**

(a) The DSL and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.

(b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex B of KCSIE.

(c) Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, maintained) for further details.

22.6.11 **Teaching students about safeguarding**

(a) The School teaches students about safeguarding through the curriculum, Pastoral sessions, Tutor Assembly sessions and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

(b) The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

(c) Students are taught about harmful sexual behaviours through Relationships and Sex Education and PSHE education appropriate to their age and stage of development. This content will be relevant, include scenario-based learning and tackle issues such as healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, promoting healthy and positive masculinities, how to recognise abusive relationships including coercive and controlling behaviour[8], concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, honour or faith-based violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable, and online harms such as making or sharing nudes and semi-nudes, deepfakes, pornography and misogynistic influencers and when and where to seek help.

(d) Where lessons are delivered by external agencies, schools should agree in advance of the session how a safeguarding concern would be dealt with by the external visitor.

(e) Students are given the opportunity to talk about safeguarding issues within the classroom environment and provide feedback on the content and effectiveness of training given. They are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. This is reiterated throughout the year by pastoral teams.

(f) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that students learn how to keep themselves safe on-line and when accessing remote learning. The Proprietor of the School has ensured appropriate filters and

[8] The Home Office publish guidance on Controlling or coercive behaviour which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

monitoring systems are in place and meet the DfE's filtering and monitoring standards (see the Online Safety Policy and Student Mobile Phone and IT/Cyber Security Acceptable Use Policy) and is mindful that this should not lead to unnecessary restrictions on learning.

(g) The School keeps in regular contact with parents and carers to reinforce the importance of students being safe online and make them aware of the systems in place to filter and monitor online use and the sites students will be expected to access during learning.

23 Monitoring and review

23.1 The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.

23.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Proprietor. Where an incident involves a member of staff, the LADO(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

23.3 This Policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.4 The Proprietor will also undertake an annual review of this Policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks its students face, including checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record kept.

23.5 The DSL will work with the Nominated Safeguarding Governors to prepare a written report commissioned by the Proprietor. The written report should address how the School ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

23.5.1 inspection of records or feedback from external agencies including the LADO(s);

23.5.2 reports of ISI inspections;

23.5.3 the outcome of any relevant complaints, claims or related proceedings; and

23.5.4 press reports.

23.6 The Proprietor will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 a clear and comprehensive summary of the concern;

24.1.2 details of how the concern was followed up and resolved; and

24.1.3 a note of any action taken, decisions reached and the outcome.

24.2 The information created in connection with this Policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published privacy notices on its website which explain how the School will use personal data.

24.3 All records created in accordance with this Policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

24.4 Insofar as student records are concerned:

24.4.1 Staff are trained on the School's safeguarding record keeping systems. All concerns about a student must be recorded on CPOMS. Guidance on record keeping is set out in Appendix 2.

24.4.2 The DSL is responsible for managing all child protection files in accordance with KCSIE.

24.5 **Information sharing and multi-agency working**

24.5.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.

24.5.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will

not stand in the way of the need to promote the welfare, and protect the safety, of students, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and data protection laws provide a framework to ensure that personal information is shared appropriately.

24.5.3 When the School intends, as a result of a professional or legal duty, or otherwise, to share safeguarding information, the School will always seek to inform the student, their parent(s) or carer(s) about what information sharing has taken (or will take) place, why and how the information will be used, unless doing so could put a child or others at further risk of harm, or could compromise effective safeguarding arrangements, including police investigations. When deciding what information to share, the School will consider its relevance to the current safeguarding risk, what the receiving setting needs to know, and whether it is clearly presented and appropriately contextualised. The School will use professional judgement to ensure that the information shared is focused and proportionate. This may include by summarising or omitting information which is not necessary for safeguarding purposes.

24.5.4 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under data protection laws. Where a request for safeguarding information is received from a parent for an individual aged under 18, the School may be exempt from providing that data where complying with the request would not be in the best interests of the child. The School will also have regard to its data protection policies. The School's Data Protection Lead (Director of Finance and Operations) will work with the DSL as appropriate to determine what should be disclosed.

24.5.5 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

24.5.6 Where a student leaves the School to attend a new setting, the DSL will consider if it would be appropriate to share any information with that setting, particularly where the information would support an assessment of risk to others as well as the individual student.

24.5.7 Where allegations have been made against staff, the School will consult with the LADO(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

24.5.8 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

25 Version control

Date of adoption of this Policy	Pending
Date of last review of this Policy	September 2026
Date for next review of this Policy	September 2027
Policy owner (Executive)	Designated Safeguarding Lead
Policy owner (Proprietor)	Mr Jatinder Harchowal, Chair of Governors

Appendix 1 Forms of abuse, neglect and exploitation and specific safeguarding risks

1 Abuse, neglect and exploitation

1.1 Staff should be aware that abuse, neglect and exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputies).

1.2 Children can also abuse their peers online. This can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography with those who do not want to receive such content.

2 Indicators of abuse and neglect

2.1 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive controlling behaviour and economic or financial abuse, where they see, hear or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. This includes in teenage relationships, or under the guise of honour-based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

2.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

2.3 **Emotional abuse:** the persistent emotional or psychological maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed

on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudice-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

2.4 **Sexual abuse:** involves forcing or enticing, encouraging, assisting or coercing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The school policy and procedures can be found in Appendix 3.

2.5 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include affluent neglect or neglect of, or unresponsiveness to, a child's basic emotional needs.

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the student says they have been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a student's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the student's behaviour;

3.1.4 the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the student's development is delayed, the student loses or gains weight or there is deterioration in the student's general well-being;

3.1.6 the student appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the student is reluctant to go home, or has been openly rejected by their parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.

3.3 The KRSCP can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific safeguarding issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 sponsored students (see section 5 below);

4.1.2 child abduction and community safety incidents;

4.1.3 children and the court system;

4.1.4 children missing from education (see section 6 below);

4.1.5 children with family members in prison;

4.1.6 Elective home education (EHE); (see section 7 below)

4.1.7 child criminal exploitation and child sexual exploitation (see section 8 below);

4.1.8 county lines (see section 9 below);

4.1.9 serious violence (see section 10 below)

4.1.10 modern slavery and the national referral mechanism;

4.1.11 cybercrime (see section 11 below);

4.1.12 domestic abuse (see section 12 below);

4.1.13 homelessness;

4.1.14 mental health (see section 13 below);

4.1.15 honour or faith-based abuse (including Female Genital Mutilation and Forced Marriage) (see sections 14, 15 and 16 below);

4.1.16 preventing radicalisation (see section 17 below);

4.1.17 child-on-child abuse (see Appendix 3);

4.1.18 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);

4.1.19 making or sharing nudes and semi-nudes (see section 20 below);

4.1.20 upskirting (see section 21 below).

4.1.21 children who are lesbian, gay or bisexual (see section 25 below);

4.1.22 children who are questioning their gender (see section 26 below);

4.1.23 misinformation / disinformation (see section 27 below);

4.1.24 young carers (see section 28 below);

4.1.25 children with medical conditions (see section 29 below).

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Sponsored Students

5.1 Some of our students may hold visas (typically Child Student visas) which are sponsored by the School under a licence granted by UKVI. These students may be living far away from their families, having to adapt to what may be a very different culture, and may also encounter difficulties in communicating in English or reaching their parents due to time zone differences. The School recognises the additional safeguarding risks associated with these students and the additional duties imposed by virtue of its status as a licensed sponsor. In addition to the requirements set out in KCSIE, the School will ensure that appropriate and safe care arrangements are in place, in line with Immigration Rules and UKVI's

Student Sponsor Guidance. There is respect for diversity and sensitivity to race, culture and religion, alongside the other protected characteristics.

6 Children who are absent from education

6.1 Children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called honour or faith-based abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a student from the School gives rise to a concern about their welfare.

6.2 The School will follow up on absences in a timely manner and, if a child is absent from School for a prolonged period of time or without notification from the parent or carer of the child, attempts must be made to contact the child's parents and / or carers and alternative emergency contacts. The School will consider patterns and trends in a child's absences and their personal circumstances and use its professional judgement when deciding if the child's absence should be considered as prolonged. Consideration will also be given to the child's vulnerability, their parent's and / or carer's vulnerability and their home life. Any concerns will be referred to the local children's social care services and / or a police welfare check requested.

6.3 Where reasonably possible the School will hold more than one emergency contact for each student.

6.4 The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register outside of standard transition times in accordance with the requirements of the School Attendance (Pupil Registration) (England) Regulations 2024.

6.5 The School shall also inform the child's home local authority children missing education team without delay where enquiries following a student's absence lead the School reasonably to believe that the child will not return and no alternative provision has been confirmed by the parents/carers.

6.6 This will assist the local authority to:

6.6.1 fulfil its duty to identify children of compulsory school age who are missing from education; and

6.6.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

6.7 Where a child is identified as CME, the School should continue reasonable enquiries to identify the child's whereabouts, in collaboration with the local authority or the child's home local authority, until it is mutually agreed that there are no further actions the School can take.

6.8 The School shall provide the local authority with the names and addresses of all students of compulsory school age who:

6.8.1 fail to attend School regularly; or

6.8.2 have been absent for a continuous period of ten school days where their absence has been recorded with one of more of the codes statistically classified as unauthorised (G,N,O and/or U). The frequency will be determined by the local authority, but no less frequently than once per calendar month; or

6.8.3 have been recorded with code I (illness) and who the School has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness in a school year.

7 Elective Home Education (EHE)

7.1 Where a parent expresses their intention to remove a student from School with a view to educating at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

8 Child Sexual Exploitation (CSE) and Child Criminal exploitation (CCE)

8.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

8.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

8.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/ or

8.1.3 through violence or threat of violence to victims (and their families).

8.2 Children can be exploited by adult males or females, as individuals or in groups , including organised networks or gangs which the victim may identify as being a part of - where this is the case, it is important that the child perpetrator is also recognised as a victim.

8.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery[9].

8.4 International students (if any) may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their parent(s) or legal guardian, and schools which hold a Child Student sponsor licence may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.

8.5 Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

8.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

8.7 Some of the following can be indicators of both CSE and CCE, including children who:

8.7.1 appear with unexplained gifts, money or new possessions;

8.7.2 associate with other young people involved in exploitation;

8.7.3 suffer from changes in emotional well-being;

8.7.4 misuse drugs and alcohol;

8.7.5 go missing for periods of time or regularly come home late; or

8.7.6 regularly miss school or education or do not take part in education.

8.8 Children who have been exploited will need additional support to help maintain them in education[10].

8.9 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

8.10 CSE does not always involve physical contact; it can also occur through the use of technology, including through generative AI and AI-generated nudes or semi-nudes (deepfakes). CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge

[9] Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

[10] For more information and resources see Baroness Casey's June 2025 National Audit on Group-based CSE and abuse, The Children's Society and The Centre of Expertise on Child Sexual Abuse.

(e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

8.10.1 have older boyfriends or girlfriends; or

8.10.2 suffer from sexually transmitted infections or become pregnant.

9 County lines[11]

9.1 County lines[12] is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move, store and sell the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

9.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

9.3 A number of the indicators for CSE and CCE as detailed above (and in Annex A of KCSIE) may also be applicable to children involved in county lines.

9.4 Additional reporting duties:

9.4.1 If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

9.4.2 Where a student may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism13 should be considered.

[11] Fearless, a dedicated youth service connected to Crimestoppers, has produced a free resource which provides information about county lines including the signs to spot, a glossary of terms and information on the grooming process which schools may find helpful.
[12] See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information
[13] For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and HO guidance: trafficking: safeguarding children.

10 Serious violence

10.1 Serious violence may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

10.2 Staff should report any concerns about a child carrying or using a weapon, or expressing an intention to do so, to the DSL. The DSL will assess risk to the individual student and others, consider wider information, take appropriate action and, where relevant, put in place a safety and support plan and action to de-escalate peer conflict.

10.3 Indicators which may signal that children are at risk from, or are involved in, serious violence may include:

10.3.1 Increased absence from school;

10.3.2 a change in friendships or relationships with older individuals or groups;

10.3.3 a significant decline in educational performance;

10.3.4 signs of self-harm or a significant change in wellbeing;

10.3.5 signs of assault or unexplained injuries; and

10.3.6 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

10.4 Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education, such as suspensions, permanent exclusion or time in alternative provision, or a history of offending. Schools should also be alert to when children might be at highest risk, recognising that violence can peak just before or after school, when students are travelling to and from school, and can concentrate in particular places.

10.5 Staff should also be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been suspended, spent time in alternative provision or permanently excluded, having experienced child maltreatment, having been involved in offending, such as theft or robbery, having used drugs or alcohol in early adolescence and having previously been a victim or previously perpetrated violence.

10.6 Early, evidence-based support at critical points when concerns emerge is vital. This includes access to trusted adults, social and emotional skills support and, where available, targeted interventions such as mentoring or therapeutic support.

10.7 Further advice is available in the Home Office guidance Criminal exploitation of children and vulnerable adults: county lines. The Youth Endowment Fund (YEF) (the "what works centre for preventing violence") has produced practical guidance for schools and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence.

11 Cybercrime

11.1 Cybercrime is a criminal activity committed using computers and / or the internet. It is broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

11.2 Cyber-dependent crimes include:

11.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

11.2.2 denial of Service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

11.2.3 making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

11.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

11.4 The School will put in place appropriate measures to meet the Cyber security standards in order to combat cyber attacks and improve cyber resilience.

11.5 The DSL (or deputies) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide preventative programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and diverts them to a more positive use of their skills and interests.

12 Domestic abuse

12.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional, or other abuse such as honour or faith-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking.

12.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

12.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

12.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex A of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children[14].

13 Mental health[15]

13.1 Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide.

13.2 Only appropriately trained professionals can make a diagnosis of a mental health problem; however, staff are well placed to observe children day to day and identify students whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

13.3 Potential warning signs could include:

13.3.1 significant changes in behaviour;

13.3.2 ongoing difficulty sleeping;

13.3.3 withdrawing from social situations;

13.3.4 not wanting to do things they usually like; and

13.3.5 physical signs of self-harm or neglecting themselves.

13.4 Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their

[14] In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. More information about the scheme can be found in the statutory guidance for police: Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass.

[15] The NHS Every Mind Matters website contains helpful information and advice about looking after a child's mental health. In addition, the Hub of Hope is the UK's leading mental health support database. It brings local, national, peer, community, charity, private and NHS mental health support and services together in one place, so that anyone struggling can find the most appropriate support.

mental health and contemplating suicide and offer support and vital early intervention.

13.5 If staff have a concern about a child's mental health, they should speak to the DSL. If staff feel that a child is in danger, they should call 999 or arrange for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent mental health help but it is not an emergency, staff can use NHS 111 online or call 111 and select the mental health option.

13.6 The NHS Every Mind Matters website contains information and advice about children's mental health. The Hub of Hope database brings together local, national, peer, community, charity, private and NHS mental health support and services.

14 Honour or faith-based abuse

14.1 Honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse, regardless of motivation, and should be handled and escalated as such. Staff must be alert to the possibility of a child being at risk of HBA, or already having suffered, HBA. Staff should speak to the DSL if they have any doubts.

14.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

15 Female genital mutilation (FGM)

15.1 FGM is a form of honour or faith-based abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

15.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61- 63 focus on the role of schools).

15.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students. Unless the teacher has a good

reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

15.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this Policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

15.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

16 Forced marriage

16.1 Forced marriage is also a form of honour or faith-based abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

16.2 Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

16.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023).

16.4 Staff should speak to the DSL if they have any concerns. Pages 79-84 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

17 Radicalisation and the Prevent duty

17.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

17.2 The School aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an

atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

17.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

17.4 **Extremism:** *"the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

17.4.1 *negate or destroy the fundamental rights and freedoms of others; or*

17.4.2 *undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*

17.4.3 *intentionally create a permissive environment for others to achieve the results in (1) or (2).*"

17.5 **Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*

17.6 **Terrorism**: *"an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."*

17.7 Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

17.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

17.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate

support required. Whilst the referral is being assessed, any further or new information should also be passed to the police. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023). The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting students at risk.

18 Child-on-child abuse (including sexual harassment and sexual violence)

18.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

18.2 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

19 Online safety

19.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

19.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

19.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

19.3.1 **content**: being exposed to illegal, inappropriate or harmful content, for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;

19.3.2 **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate such interaction; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

19.3.3 **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual making or sharing of nudes and semi-nudes and / or pornography, sharing other explicit images) and online bullying; and

19.3.4 **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

20 Making or sharing nudes and semi-nudes

20.1 Consensual and non-consensual making or sharing of nudes and/or semi-nudes can be signs that children are at risk.

20.2 The School treats all incidents of making or sharing nudes and semi-nudes as breaches of discipline and safeguarding matters to be actioned in accordance with this Policy, whether consensual or non-consensual. The response will be proportionate and consider the age[16], development and circumstances of the children involved and any elements of coercion, exploitation or vulnerability.

20.3 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

20.4 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

20.4.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

20.4.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the student or parent in making a report; or

20.4.3 a student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the School's devices or network.

20.5 Where viewing an image is unavoidable:

20.5.1 viewing should take place on School premises wherever possible;

20.5.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

20.5.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

[16] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal, whilst non-consensual is illegal and abusive.

20.5.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

20.5.5 any member of staff who views an indecent image should be given appropriate support.

20.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

20.7 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

20.8 If external agencies do not need to be involved, the School must consider the deletion of any images. Students should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

20.9 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

20.10 Where a student receives unwanted images, the School should advise the student and their parents/carers of options that may be available to block the sender or to change the student's mobile phone number or email address.

20.11 The UK Council for Internet Safety advice note *Sharing nudes and semi-nudes*: advice for education settings working with children and young people (DSIT and UKCIS, March 2024) contains details of support agencies and further information for schools on responding to incidents of making or sharing nudes and semi-nudes.

21 Upskirting

21.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

21.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

21.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

21.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to making or sharing nudes and semi-nudes / sexting.

22 Special educational needs and disabilities or physical health issues

22.1 The School welcomes students with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's Special Educational Needs and Disabilities (SEND) Policy, Equality, Diversity and Inclusion Policy and Disability Policy and Accessibility Plan.

22.2 Additional barriers can exist when detecting the abuse or neglect of students with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

22.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's condition without further exploration;

22.2.2 students with SEND or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;

22.2.3 some students may be unable to understand the difference between fact and fiction in online content (including AI generated content) and can repeat the content/behaviour in school without understanding the consequences;

22.2.4 there is a risk of students with SEND not understanding that what is happening to them is abuse;

22.2.5 students with SEND are more likely to be dependent on adults for care and to require intimate care; and

22.2.6 there may be communication barriers which are difficult to overcome to identify whether action under this Policy is required.

22.3 The School should consider providing extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place.

23 Looked after children and previously looked after children

23.1 The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

23.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

23.1.2 contact arrangements with birth parents or those with parental responsibility;

23.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

23.2 The DSL maintains these details, including contact details of the child's social worker. See 6.5.4 in the Policy for the DSL's role in relation to students who are looked after children.

24 Care leavers

24.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

25 Children who are lesbian, gay, or bisexual

25.1 A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, the School recognises that they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

25.2 LGBT inclusion is taught as part of the statutory relationships education/ RSE/ PSHE curriculum.

All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

26 Children who are questioning their gender

26.1 The School recognises that some children and young people may question their gender, including how they feel about the physical attributes of their sex and how they fit into society. The School recognises that it is not uncommon for children, particularly at a younger age, to explore interests, behaviours or expressions that may not align with gender stereotypes, and for many children this may be a temporary phase.

26.2 The School will take a supportive, child-centred approach, seek to understand the child's views, wishes and feelings, and exercise appropriate professional curiosity about their wider circumstances. This includes being alert to:

26.2.1 mental health or emotional wellbeing needs;

26.2.2 experiences of bullying, including discriminatory or prejudice-based bullying;

26.2.3 family, peer or social pressures; and

26.2.4 any other vulnerabilities that may affect the child's welfare.

26.3 The School will maintain a respectful environment in which all students feel safe and able to express themselves. Bullying related to gender, gender expression or identity is unacceptable and will be addressed promptly under the Behaviour and Anti-Bullying Policies.

26.4 The School will seek to maintain an environment that avoids unnecessary gender stereotyping and supports inclusion while also ensuring that safeguarding, welfare, safety and fairness considerations are appropriately balanced.

26.5 Where a request is made in relation to social transition, the School will consider it under its Gender Questioning Children Guidance, including the child's welfare, the safety and fairness of any proposed arrangements and the impact on other students. The School will not initiate social transition; this provision applies where a child or parent/carer raises a request and the School is responding to it.

27 Misinformation / disinformation

27.1 The School recognises that misinformation, disinformation and conspiracy theories may present safeguarding risks, particularly where they contribute to harm, radicalisation or exploitation. Staff will be alert to these risks and respond appropriately.

28 Young carers

28.1 The School recognises that caring responsibilities can affect attendance, attainment, behaviour and wellbeing. Early identification is essential so that young carers receive support at the right time from appropriate services, including external partners and local authority and health services.

29 Children with medical conditions

29.1 A child having a medical condition, including allergies and conditions requiring delegated healthcare tasks, is not in itself an indicator that the child is at greater safeguarding risk. If a clinical incident occurs, the responsible healthcare professional, with the DSL, should consider whether any safeguarding duty has been triggered and whether further action is required based on the nature of the incident.

Appendix 2 Concerns about a child - guidance for staff

1 Receiving a disclosure

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Take the student to the School Nurse if there is a medical need and not examine the injury yourself.

1.3 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a student if they disclose something which suggests that a criminal offence may have been committed - the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

1.4 Reassure the student they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this Policy so that the correct action can be taken.

1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.7 Pass on the record when reporting the concern in accordance with this Policy.

2 Recording a concern

2.1 Staff must record all concerns in writing on CPOMS.

2.2 Records should be factual and entered by the relevant person on CPOMS. They should be signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the student's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event/concern / conversation;

2.2.4 details of how the concern was followed up and resolved;

2.2.5 a note of any action taken and by whom, decisions reached and the outcome;

2.2.6 the name and position of the person making the record.

2.3 Safeguarding concerns should be recorded electronically on CPOMS. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 Use of restrictive interventions, including reasonable force

3.1 There are circumstances when it is appropriate for staff to use restrictive interventions, including reasonable force, seclusion and restraint, to safeguard students and others. All members of staff have a legal power to use reasonable force in certain circumstances. In all cases, "reasonable" means using no more force than is necessary, for the least amount of time required to address the risk.

3.2 Staff should refer to the Behaviour Policy and the Code of Conduct for Staff for more detailed guidance about restrictive interventions and the use of reasonable force.

Appendix 3 Dealing with allegations of child-on-child abuse (including sexual harassment and sexual violence)

1 Child-on-child abuse

1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying, and faith-based prejudice or faith- or race-based discrimination);

1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);

1.1.3 physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4 physical assault and harm, or the threat of harm with a weapon;

1.1.5 harmful sexual behaviour, including misogyny, and sexual violence such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, and unwanted kisses or embraces), possibly with an online element which encourages sexual violence;

1.1.6 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.7 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

1.1.8 consensual and non-consensual making or sharing of nudes and semi-nudes;

1.1.9 upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

1.1.10 initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).

2 The School's approach to child-on-child abuse

2.1 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns, whether thought to have occurred on or off site, to the DSL (or a DDSL in the DSL's absence).

2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up") can lead to a culture of unacceptable behaviours, an unsafe environment for children, misogyny, and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward.

2.3 All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help. Staff must consider the nature, context, impact and any pattern or escalation of the behaviour and report any safeguarding concern to the DSL.

2.4 All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Such behaviour is preventable, and early intervention is key.

2.5 All staff should challenge inappropriate behaviour, including sexism and misogyny, between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with this policy and / or the School's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

2.6 Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at School, or when the student involved was under the School's care and whether or not the student is under 18, as an issue which may impact student welfare. Disciplinary action will follow separately, if appropriate.

2.7 The School will ensure students impacted by child-on-child abuse are made aware of appropriate support resources that are available to them.

3 Harmful sexual behaviour (HSB), sexual violence and sexual harassment (SVSH)

3.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful sexual behaviour" applies to behaviour occurring online, face to face or both and should always be considered within a child protection context[17].

3.2 The School adopts a whole-school approach to preventing HSB, sexual violence and sexual harassment, underpinned by its safeguarding, behaviour and pastoral systems. This includes:

3.2.1 promoting a culture of kindness, respect and equality;

3.2.2 identifying and addressing sexism, misogyny, homophobia and harmful stereotypes; and

3.2.3 ensuring staff model positive behaviour and challenge harmful attitudes appropriately, including challenging ideas without stigmatising individuals.

3.3 Where the misconduct may constitute HSB, sexual violence[18] (rape, assault by penetration, sexual assault[19] or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and managed in accordance with this policy. SVSH is never acceptable.

3.4 Whilst any report of HSB, sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of HSB and SVSH and more likely it will be perpetrated by boys.

3.5 SVSH can occur between two or more children of any age or sex from primary to secondary stage, both inside and outside School, occur online. It can also occur through a group of children acting towards a single child or another group. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. Addressing inappropriate behaviour, including sexism and misogyny (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating HSB. The School also recognises the escalatory nature of

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[17] Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning. Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour.

[18] When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

[19] Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault.

misogyny and the benefits of early intervention to support its approach to minimising the risk of HSB, sexual harassment and sexual violence.

3.6 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The school acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child-on-child SVSH

4.1 The initial report

4.1.1 The School recognises that it is not easy for children to tell staff about abuse and that they may instead show signs or behave in ways that signal distress. Staff are trained to identify signs of abuse, act on them and respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of HSB and SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3 They should:

(a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

(b) where possible they should ask open questions about whether student(s) have been harmed, the nature of the harm or if they may be at risk of harm;

(c) where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child[20];

(d) explain the next steps and how the report will be progressed;

[20] School staff can search students with their co-operation for any item. If a student refuses to co-operate staff may use reasonable force to search students if they have reasonable grounds for suspecting a student is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case by case basis. See https://www.gov.uk/government/publications/searching-screening-and-confiscationfor further information.

(e) make a written record of the report (recording the facts as the child has presented them);

(f) inform the DSL (or deputies) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 **DSL's considerations**

4.2.1 Reports of HSB and SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the students involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 **School's considerations**

4.3.1 The School will consider:

(a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as reasonably possible regarding how an investigation will progress and what support they are offered, but their wishes will not always be determinative as the school may have to take action to protect other children;

(b) the nature of the alleged incident, including whether it was a one-off or sustained pattern, whether a crime may have been committed and whether [21]HSB has been displayed;

(c) the ages and developmental stages of the children involved and any imbalance between them, such as differences in age, maturity or social status;

(d) if there is an intimate personal relationship between the children;

(e) whether the alleged incident was isolated or part of a sustained pattern of abuse;

(f) any intrafamilial harm and the need for support for siblings;

(g) whether there are any ongoing risks to those involved;

[21] Hackett's sexual behaviours continuum may help identify whether behaviour is normal, inappropriate, problematic, abusive or violenthttps://www.lucyfaithfull.org.uk/advice/concerned-about-a-child-or-young-persons-sexual-behaviour/what-is-harmful-sexual-behaviour/?utm_campaign=1540968_HSB+Toolkit+email_SOCIAL+MEDIA&utm_medium=email&utm_source=Lucy+Faithfull+Foundation&dm_i=48W7%2CX10O%2C38NO7C%2C43A9L%2C1. The Lucy Faithfull Foundation HSB toolkit and the Fearless resource on child sexual abuse and harmful sexual behaviour provide additional support. KCSIE 2026 also sets out considerations for assessing HSB.

(h) the time and location of any incident, and any action required to make the location safer;

(i) the wider context, including any links to child sexual exploitation or child criminal exploitation.

4.3.2 Before deciding how best to support and protect those involved. The School will undertake immediate risk and needs assessments:

these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents/carers. This may involve suspension pending investigation. Risk and needs assessments will be recorded, used to inform ongoing safeguarding decisions and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The School will make a proportionate response to these matters in light of the circumstances and the factors identified above and decide if any further action is appropriate.

4.3.4 The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.[22]

5 Investigations and findings

5.1 The School will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

5.2 The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral, restorative response and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/ or harmful sexual behaviours

[22] Fearless, a youth service connected to Crimestoppers, enables young people to report crime anonymously and provides a resource on child sexual abuse and harmful sexual behaviour. The Lucy Faithfull Foundation and the Home Office have also developed Shore Space, an online confidential chat service for young people concerned about their own or someone else's sexual thoughts and behaviour.

identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Raising allegations and low level concerns

1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low level concern under this policy.

Designated Safeguarding Lead (DSL) Mr Ollie Garner (Assistant Head, Safeguarding and Wellbeing)	Email: dsl@kgs.org.uk or ogarner@kgs.org.uk
	Telephone number (term time): 020 8481 3667
	Holiday /out of hours: dsl@kgs.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Mr Andy Beard (Assistant Head, Head of Lower School) Email: abeard@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8939 8829
	Mr Simon Grant (Head of Second Year) Email: sgrant@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8939 8320
	Mrs A Lett (Assistant Head, Head of Upper School) Email: ALett@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8939 8804
	Ms A Williams (Deputy Head Pastoral, Head of Sixth Form) Email: AWilliams@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8481 3672
	Mrs S Moledina (School Nurse) Email: SMoledina@kgs.org.uk or dsl@kgs.org.uk Telephone (term time): 020 8939 8841
	Mrs Anna Edwards (Head of Psychology) Email: Aedwards@kgs.org.uk Telephone (term time): 020 8481 3653
Head Mr. Stephen Lehec	Email: head@kgs.org.uk
	Telephone number: 020 8939 8801
Chair of Governors	Email: jharchowal@kgs.org.uk

Mr Jatinder Harchowal	Telephone number: 020 8546 5875
Governors Responsible for Safeguarding	Nominated Safeguarding Governor: Ms Liz Dux Email: ldux@kgs.org.uk Telephone number: 020 8546 5875
	Deputy Safeguarding Governor: Ms Sally Bryce Email: Sbryce@kgs.org.uk Telephone number: 020 8546 5875
Designated Officer(s) of the local authority (LADO)	Telephone number: 07774 332675 Email: LADO@achievingforchildren.org.uk Online: Submit LADO referral form

2 Purpose and application

Purpose: the School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this Policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

Application: the Policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including governors, supply staff, trainee teachers, volunteers and contractors (Staff).

Other adults: although this Policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the School. Should concerns be raised about people who are not staff or students, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

Statutory guidance: this Policy has regard to the following statutory guidance:

(a) Keeping children safe in education (September 2026) (KCSIE). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, trainee teachers, volunteers and contractors, who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(i) concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and

(ii) allegations that may meet the harm threshold.

(b) Working together to safeguard children 2026 (WT), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff duties

3.1 Staff behaviour: all Staff must comply with the School's Staff Code of Conduct which sets out appropriate and expected standards of behaviour.

3.2 Duty to report: as a member of Staff, you must immediately follow this Policy to report any concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the School). This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, student, parent or another adult, or as a result of checks or information brought to your attention.

3.3 Duty to self-refer: you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 A culture of sharing: All Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

4.1 Reporting all concerns: all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

4.2 Low level concerns: a low level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct,

whether inside or outside of work. No concern is too small or minor to raise under this Policy.

4.3 Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or

4.3.2 possibly committed a criminal offence against or related to a child; and / or

4.3.3 behaved towards a child or children in a way that indicates they would pose a risk of harm to children; and / or

4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.

4.4 Definition of Harm: it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";

4.4.2 the Children Act 1989 defines:

(a) "harm" as "ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill-treatment of another";

(b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

(c) "health" as "physical or mental health".

5 How to raise concerns and allegations

5.1 Raising low level concerns: Where you have a low level concern in respect of any member of Staff, you must report the matter immediately. You can raise this with the Head or with the DSL.

5.2 Duty of the DSL to refer concerns to the Head: the Head remains the ultimate decision-maker in respect of all low level concerns. Save for in cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible, the DSL must speak to the Head in person about the concern as soon as possible after

the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.

5.3 Concerns about Staff: Where you have a concern about the conduct of a member of Staff (other than the Head) that may meet the harm threshold you must raise this immediately with the Head.

5.4 Concerns involving the Head and conflicts of interest: where you identify a concern about the Head, you must report the matter immediately to the Chair of Governors without first notifying the Head. Where there is a conflict of interest in raising the concern with the Head, you must report the concern directly to the Local Authority Designated Officer (LADO), without first notifying the Head. Details of the LADO can be found at the start of this policy.

5.5 Concerns involving Governors: where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or one of the Nominated Safeguarding Governors. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.

5.6 Concerns involving individuals/organisations using School premises: where the School receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.

5.7 Reports to the DSL: If it is not possible for you to make a report to the Head or Chair of Governors or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor(s).

6 The School's response to concerns and allegations

6.1 Appropriate action: the School will ensure that appropriate action is taken to address concerns that are raised under this Policy.

6.2 Assessing concerns: The Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor(s)) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, the Head, the Chair of Governors and the Nominated Safeguarding Governors have all been trained to assess concerns, and to record and address them appropriately.

6.3 Low level concerns: If the School determines the concern is a low level concern, then the School will address the concern as appropriate. This

will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

6.4 Borderline cases: the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor(s)) may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

6.5 Referral: where the Head (or, if the concern relates to the Head, the Chair of Governors) considers the concerns raised potentially meet the harm threshold, the Head (or, if the concern relates to the Head, the Chair of Governors) will make a report to the LADO before further action is taken. The Head (or, if the concern relates to the Head, the Chair of Governors) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this Policy.

6.6 Responding to an allegation that may meet the harm threshold: where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

6.7 Case Manager: where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Head or a person with appropriate authority appointed by the Head. Where the Head is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or one of the Nominated Safeguarding Governors.

7 Disclosure of information about concerns and allegations

7.1 Informing the individual of a concern: the School will in most cases inform the individual concerned about any low level concern that is raised about them.

7.2 Informing the individual of an allegation where appropriate: the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

7.3 Communication and support for the individual subject to an allegation: if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In

all cases, the investigation will be concluded as soon as reasonably practicable.

7.4 Informing the child's parents / carers where appropriate: the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

7.5 Reporting restrictions: the School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

7.6 Involvement of external agencies: where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7.7 Concerns about supply staff, trainee teachers and contractors: where a concern / allegation has been made in respect of a member of supply staff, a trainee teacher placed within the School or a contractor, the School recognises that it shares safeguarding responsibilities with the relevant employing agency, teacher training provider or contracting organisation. The concern or allegation will be notified to the employer or teacher training provider, and the School will work with them to coordinate any investigation and safeguarding response. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

8 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

8.1 Report to the DBS: the School is under a legal duty to make a referral to the DBS where:

8.1.1 an individual has applied for a position at the School despite being barred from working with children; and /or

8.1.2 an individual, including a volunteer, has been removed by the School from regulated activity, whether paid or unpaid, or has resigned prior to being removed, or in the case of a volunteers has ceased to volunteer at the School in circumstances where they would otherwise have been removed, because they have:

(a) satisfied the harm test (as defined in section 35 of the Safeguarding Vulnerable Groups Act 2006);

(b) committed relevant conduct (as defined in Schedule 3 to the Safeguarding Vulnerable Groups Act 2006); or

(c) been cautioned for, or convicted of, a relevant offence (as defined in paragraphs 1 and 2 of Schedule 1 to The Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Relevant Offences) Regulations 2009).

8.2 Report to the Teaching Regulation Agency (**TRA**): the School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

9 Record keeping

9.1 Records of low level concerns: low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (Concerns and Allegations Record).

9.2 Recording low level concerns: the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.

9.3 Records of allegations that may meet the harm threshold: details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

9.4 Storage and security of Concerns and Allegations Record: the Concerns and Allegations Record will be stored on the School's secure intranet

system and will be accessible by the Head, the Chair of Governors, the Nominated Safeguarding Governors, the DSL and the Head of HR only.

9.5 Malicious or false low level concerns and allegations: details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

9.6 Retention of records: information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

10 References

10.1 Low level concerns: low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

10.2 Allegations that meet the harm threshold: allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

Appendix 5 Charity safeguarding procedures

1 Charity Safeguarding duties

1.1 As trustees of a charity, the trustees as Proprietor of the School, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone involved with or who come into contact with the charity through its work from harm, abuse or mistreatment whether working online or in person. This protection of the people involved in the charity is central to its culture. The full extent of these additional Safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches. We recommend that you also consider the Charity Commission guidance *Charities and social media*, including its guidance on moderation of comments on the School's social media.

1.2 The contents of the School's Safeguarding and data protection suites of policies, the staff code of conduct and the Health and safety policy set out how many concerns about these issues will be handled. If anyone has any Safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact the DSL without delay.

1.3 The trustees fulfil these duties by:

1.3.1 leading by example and promoting a fair, inclusive and positive culture to which protecting people from harm is central, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;

1.3.2 having procedures for identifying and handling concerns in a full and open manner;

1.3.3 setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;

1.3.4 ensuring that where safeguarding responsibility is delegated to individuals or subgroups, robust policies and procedures for reporting appropriate information to the wider Governing Body are in place and followed;

1.3.5 establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;

1.3.6 exercising proper oversight of the management of individual Safeguarding matters and a review of the performance of the charity's Safeguarding function, including consultation with stakeholders and appropriate trend analysis;

1.3.7 being quick to respond to concerns, to carry out appropriate investigations and take necessary action;

1.3.8 being open and transparent and not ignoring harm or downplaying failures;

1.3.9 managing conflicts of interest and / or loyalty;

1.3.10 ensuring that staff receive training in Safeguarding at a level which is commensurate with their role;

1.3.11 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:

(a) staff (with regard to differing processes for international staff)

(b) partner organisations

(c) contractors

(d) beneficiaries;

1.3.12 ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;

1.3.13 entering into appropriate agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including students)) covering the relationship, their respective roles and monitoring and reporting requirements;[23]

1.3.14 ensuring that a clear system is in place for referring or reporting to relevant agencies as soon as concerns are suspected or identified;

1.3.15 following safeguarding statutory guidance, good practice guidance and legislation applicable to independent schools;

1.3.16 having a balanced trustee board which works together in accordance with the Constitution and the Governing Body Code of Conduct without any one or more trustees dominating its work;

1.3.17 exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users;

[23] https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds

1.3.18 review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;

1.3.19 reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;

1.3.20 Implementing suitable reporting and monitoring processes in place for any work overseas;

1.3.21 set out risks and how it will manage them in a risk register;

1.3.22 allocating sufficient resources (whether financial, staff, training or other resources) for the effective management of Safeguarding and arranging appropriate insurance cover.

1.4 Ensuring a sufficient level of oversight of the charity's operations to manage risk and report any incidents which materially affect the charity's operations, finances, people or reputation can be reported to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, January 2026).